



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

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Mary A. Gade, Director

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September 26, 1997

Mr. John O'Grady
Superfund Division (SR-6J)
U.S. EPA, Region 5
77 W. Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. O'Grady,

Thank you for the copy of the final draft of the Engineering Evaluation/Cost Analysis (EE/CA) for the Vulcan Louisville Smelting Company Site (aka the Vacant Lot) CERCLIS ID# ILD984775437, located in North Chicago, Illinois.

Once again, I must express concern over the fact that the entire site has not been addressed. The Illinois EPA believes that past industrial activities in the area (dating back to the time of Vulcan Louisville Smelting Co.) have caused contamination of nearby soils, groundwater and streams. The Illinois EPA feels very strongly that areas beyond the vacant lot, including the residential area to the north, Pettibone Creek, and the Lake Michigan Harbor should be included in the EE/CA. Past operations have affected far more than the vacant lot and that portion of Pettibone Creek that flows through it. It is known that soils in the residential areas contain elevated levels of contaminants. It is also known that Pettibone Creek downstream of the site and into Lake Michigan Harbor is contaminated, yet any risk associated with this contamination is not being evaluated.

The EE/CA Report acknowledges that these other areas are contaminated, along with groundwater to the east and northeast of the vacant lot. The vacant lot appears to be only one part of a bigger environmental problem, and addressing just this part does nothing to alleviate concerns with the other areas.

Thank you for the opportunity to review and comment on this evaluation.

Sincerely,

Judy J. Triller
Site Assessment Unit
Remedial Project Management Section
Bureau of Land Pollution

cc: Joe Dufficy, U.S. EPA

EPA Region 5 Records Ctr.



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